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March 18, 2021

VIA ECF

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
500 Pearl Street, Room 2203
New York, NY 10007

Re: *United States v. Rainedy Cepeda-Nova*, No. 19-cr-799 (RA)

Dear Judge Abrams:

On behalf of our client, Rainedy Cepeda-Nova, we respectfully submit this letter to request that the Court modify the travel conditions of Mr. Cepeda-Nova's pretrial release to permit him to travel to Santo Domingo, in the Dominican Republic, from April 1-April 11, 2021. Mr. Cepeda-Nova would like to visit his mother, who lives in Santo Domingo and who he has not seen in about two years. If the Court approves, he plans to make the trip with his fiancé and his four-month old daughter. Currently, Mr. Cepeda-Nova is permitted to travel to and within the Southern and Eastern Districts of New York, the District of New Jersey, and the Eastern District of Pennsylvania for the purposes of his employment.

We have consulted with the Government and Pretrial Services about this request. Pretrial Services takes no position on international travel, but notes that Mr. Cepeda-Nova has recently graduated from the Young Adult Opportunity Program and is in compliance with his conditions of release.

The Government's response is as follows: "Ordinarily, the Government would oppose this request because of the inherent significant risk of non-return posed by a non-citizen defendant and his family travelling to his country of citizenship. However, given the Court's greater direct familiarity with Mr. Cepeda-Nova by virtue of the Young Adult Opportunity Program, the Government is prepared to defer to the Court's judgment on this matter and takes no position on the request."

Application granted.

SO ORDERED.



Ronnie Abrams, U.S.D.J.
March 19, 2021

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Respectfully submitted,

/s/ Michael S. Schachter
Michael S. Schachter
Ravi Chanderraj

cc: AUSA Jacob Fiddelman
U.S. Pretrial Services Officer Rena Bolin